

# **EXHIBIT A**

***In re National Prescription Opiate Litigation: MDL 2804***

**WALGREENS' MOTION FOR SUMMARY JUDGMENT**

**Summary Sheet of Concise Issues Raised**

**Motion Name:** Walgreens' Motion for Summary Judgment

**Concise Description:**

Plaintiffs bring no claims against Walgreens based on its dispensing practices. The only claims against Walgreens are based on the allegedly improper distribution of prescription opioid medications back when Walgreens still distributed them—now more than five years ago. But Walgreens is a national retail chain that only ever distributed controlled substances to its own Walgreens pharmacies, which in turn dispensed FDA-approved medications to patients with prescriptions from licensed medical professionals. Unlike wholesale distributors, Walgreens never distributed to any independent pharmacy, internet pharmacy, pain clinic, or “pill mill.” That undisputed fact is a big reason why—despite extensive discovery and dozens of expert witnesses—Plaintiffs still cannot identify any evidence to support causation. A review of all the evidence and expert testimony Plaintiffs have mustered against Walgreens demonstrates that Plaintiffs have not proven and cannot prove that any supposedly “suspicious order” shipped by Walgreens to the Track One counties was *actually diverted* from a Walgreens store.

**Filing Date:** June 28, 2019

**Response Date:** July 31, 2019

**Reply Date:** August 16, 2019